

**TORRES | TORRES-STALLINGS  
A LAW CORPORATION**

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Attorneys for Defendant  
RAMON MALDONADO, JR.

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
RAMON MALDONADO, JR.,  
Defendant

Case No.: 1:23-CR-00169-JLT-SKO-1

**STIPULATION AND ORDER TO  
VACATE TRIAL DATE AND SET  
CHANGE OF PLEA DATE**

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT, THE HONORABLE  
JENNIFER L. THURSTON, AND KAREN ESCOBAR, ASSISTANT UNITED STATES  
ATTORNEY:

**COMES NOW** Defendant, RAMON MALDONADO, JR. by and through his attorney of  
record, ALEKXIA TORRES STALLINGS hereby requesting that the Jury Trial date currently  
set for March 4<sup>th</sup>, 2025 at 8:30am, be vacated. Counsel is also requesting that the Change of Plea  
Date be set for January 21<sup>st</sup>, 2025, at 8:30 am.

Counsel has had the opportunity to discuss this matter with AUSA Karen Escobar, both  
parties have agreed to requesting that the Jury Trial date be vacated, and the Change of Plea date  
be set. Both parties have reached a disposition on the matter.

1 The parties also agree the delays resulting from the continuance shall be excluded in the  
2 interest of justice pursuant to 18 USC 3161 (h)(7)(A) and 3161 (h)(7)(B)(1) and (IV) because it  
3 results from a continuance granted by the Court at defendant's request on the basis of the Court's  
4 finding that the ends of justice served by taking such action outweigh the best interest of the  
5 public and the defendant in a speedy trial.  
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7  
8 Dated: December 4, 2024

Respectfully Submitted,

9  
10 /s/ Alekxia Torres Stallings

Alekxia Torres Stalling  
Attorney for Ramon Maldonado, Jr.

11  
12 Dated: December 4, 2024

/s/Karen Escobar

Karen Escobar  
Assistant United States Attorney

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18 **ORDER**

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20 **IT IS SO ORDERED** that the Jury Trial date currently set for March 4, 2025, at  
21 8:30a.m., be vacated, and the Change of Plea date be set to January 21, 2025, at 9:00a.m.

22  
23 IT IS SO ORDERED.

24 Dated: **December 4, 2024**

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UNITED STATES DISTRICT JUDGE